

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION II

EDISON, NEW JERSEY 08837

271145

September 20, 1991

Mr. Mark Terril, P.E.
PPG Industries, Inc.
P.O. Box 2009
4325 Rosanna Drive
Allison Park, Pennsylvania 15101-2009

Re: Walton's Farm Site

Administrative Order on Consent, Appendix 1

Draft Site Operations Plan

Dear Mr. Terril:

Attached you will find the U.S. Environmental Protection Agency's (EPA) comments to the August 1991 Draft Site Operations Plan (SOP) prepared as Appendix 1 to the Administrative Order on Consent (AOC), issued to PPG Industries, Inc. by the EPA for the removal action at the Walton's Farm Site located in Delran Township, New Jersey. Please amend the SOP to reflect EPA's comments and resubmit the modified SOP to EPA for approval. The SOP modified as per EPA's comments will be considered "Final" upon signing of the Order by both PPG and EPA.

Please direct any questions regarding the comments on the Draft SOP to me at (908) 321-4345.

Sincerely yours,

Donald R. Graham, OSC Removal Action Branch

Attachments

RETAIN THIS NUMBER-CUSTOMER RECEIPT WILL BE MAILED TO YOU.

EPA Comments: Walton's Farm Draft Site Operations Plan

General:

If PPG chooses to address the sediments of the Rancoca Creek as discussed during our September 12 meeting; PI modify the existing SOP to reflect the forthcoming logical Technical Assistance Group's (BTAG) comment 3's comments are expected by September 24 and will

varded to you upon my receipt.

hough PPG has the authority to choose or change tractors, the SOP must explicitly state that any ____ractor selections are subject to EPA's approval.

Include provisions for repositioning of the fence in th event that sampling and analysis discloses additional a of contamination.

SEE

Analytical:

A sufficient analytical data base does not presently exist which fully characterizes the waste and indigenous soils. Samples of the waste and adjacent "clean" area must be collected and analyzed for full TCL/TAL parameters as part POST REMOUAL of the Pre-removal Sampling and Analyis activities. Additionally, samples must be collected and analyzed for full TCL/TAL parameters upon completion of the waste removal activity. This pre-removal and post-removal sampling and analysis is necessary to fully characterize the waste and to verify completeness of the removal process. SCREENENS

The validation study for the field screening met (Section 4.2.6) should illustrate the correlation DDD and DDE results with the compound (PCBs) for

methodology is intended.

Health and Safety:

Please review Table 1 of the Hall and Safety Plan (HASP).

The recommended leve Hall plane in for clothing appears to have been input incompared for n for clothing appears to excavation activity)

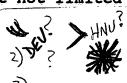
o Modifications will ! characterization (ar IASP based upon updated s) of the material.

Waste Material Handling:

Provide contingency measures for the possibility that the excavated material contains unforeseen contaminants and as such is not classifiable as a U060 or U061 waste.

 All materials generated as a result of the pre-removal investigation and removal action will be properly contained, stored and analyzed prior to shipment to the designated off-site disposal facilities. The SOP must describe, in detail, the proper handling of all waste Material will not be allowed to infiltrate on materials. the site.

o PPG shall provide EPA with all documentation relating to the disposal of any waste material generated on-site, including but not limited to manifests, Certificates of



OK BUT

NO

Destruction and LDR forms for hazardous materials and bills of lading for non-hazardous materials.

Site Support:

The decontamination pad described in the Removal Act Workplan shall be constructed prior to initiation of pre-removal investigation. There are currently no provisions for containing decon fluids generated duripre-removal activities.

Backfilling/Restoration:

Pursuant to discussions during our September 12 meeting, EPA will only require PPG to undertake measures necessary to eliminate erosion into the Rancocas Creek. PPG shall be in agreement with the land owner regarding all other backfilling and restoration activities, and keep EPA apprised of such discussions.

cc: P. Hick, EPA